Exhibit 11 to Statement of Undisputed Facts Filed in Support of Motion of American Beryllia, Inc. For Summary Judgment

GOGOLEN AFFIDAVIT AND EXHIBITS

#### UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

CASE NO. 04-CV-12137 JLT

SUZANNE GENEREUX and BARRY GENEREUX, Individually and as Parents And Natural Guardians of their minor children, ANGELA GENEREUX and KRISTA GENEREUX,

Plaintiffs

v.

AMERICAN BERYLLIA CORP., BRUSH WELLMAN, INC., BRUSH WELLMAN CERAMICS, INC., BRUSH WELLMAN CERAMIC PRODUCTS, INC., HARDRIC LABORATORIES, INC., KYOCERA AMERICA, INC., KYOCERA INDUSTRIAL CERAMICS CORP., and RAYTHEON COMPANY,

Defendants

#### AFFIDAVIT OF ROBERT GOGOLEN

- I, Robert Gogolen, under oath do hereby depose and say:
- 1. Between 1972 and 1999, I was employed at the Haskell, NJ facility of General Ceramics, Inc. in various capacities, including Production Supervisor, Engineering, and Drafting. I have personal knowledge of the facts contained in this Affidavit.
- 2. Between 1982 and 1990, General Ceramics sold a number of beryllium-containing products to Raytheon.
- 3. General Ceramics shipped metalized ceramic bushings to Raytheon between 1982 and 1990. The metalized ceramic bushings General Ceramics shipped to Raytheon were no larger than 1 ½ inches in diameter and had several different thicknesses. The metalized ceramic bushings sold to Raytheon between 1982 and

1990 had holes in them, were not windows, and had a different purpose than windows.

- 4. General Ceramics also shipped collectors to Raytheon between 1982 and 1990. The collectors General Ceramics shipped to Raytheon were no larger than 1 inch in diameter and 1 ¾ inches thick. The collectors sold to Raytheon between 1982 and 1990 had a blind hole down the middle, a hole in the side of the cylinder, were not windows and had a different purpose than windows.
- 5. I have reviewed the pertinent sections of the depositions of Suzanne Genereux, Al Broadbent, and Claire Balint, and their descriptions of the sizes of products with which Ms. Genereux worked. The descriptions of Suzanne Genereux, Al Broadbent, and Claire Balint do not match any products sold by General Ceramics to Raytheon between 1982 and 1990.
- 6. Although General Ceramics shipped windows to Raytheon between 1982 and 1990, the windows General Ceramics shipped to Raytheon were no larger than a ½ inch in diameter and .075 inches thick, much smaller than the 3" diameter discs Genereux described.
- 7. The majority of the beryllium-containing products sold to Raytheon between 1982 and 1990 by General Ceramics were pin squares. Pin squares are three-dimensional boxes. To the best of my memory, the maximum size of the pin squares that were sold to Raytheon in the 1980s was .10 in. x .10 in. x .50 in., much smaller than the "Tall Man" rectangular 1 ¼" x 1 ¼" x 2" boxes Genereux described. Pin squares are not windows, the products with which Suzanne Genereux worked. Pin squares have a different purpose than windows.
- 8. General Ceramics shipped its products to Raytheon in bulk, as requested by Raytheon.

- 9. All products shipped by General Ceramics to Raytheon contained warning labels. True and accurate copies of General Ceramics' warning labels are attached hereto as Exhibit A. All shipments containing beryllium from General Ceramics contained at least one of these warning labels.
- 10. General Ceramics also provided Raytheon with a Material Safety Data Sheet. A true and accurate copy of General Ceramics' MSDS is attached hereto as Exhibit B.
- 11. During the 1980s, General Ceramics knew that Raytheon had internal procedures regarding beryllium oxide. The plans and specifications Raytheon provided to General Ceramics between 1960 and 1995 contained details on the proper handling of beryllium oxide. True and accurate copies of plans and specifications containing this information are attached hereto as Exhibit C.
- 12. Raytheon's details on its plans and specifications demonstrated to General Ceramics that Raytheon was familiar with the properties and dangers of beryllium oxide.
- 13. General Ceramics was aware, from its own dealings with Raytheon, that Raytheon had its own procedures and policies in place to protect its own employees.
- 14. General Ceramics relied upon Raytheon to warn its own employees of the hazards of beryllium.
- 15. Between 1999 and 2001, I was not employed at either General Ceramics or American Beryllia. In 2001, I accepted a position at American Beryllia and am currently production manager.
- 16. Since its formation, American Beryllia has not sold any windows to Raytheon. Further, since its formation, American Beryllia has not sold any rectangular boxes, pin squares or otherwise, to Raytheon.

17. I am competent to testify to the matters herein.

SIGNED UNDER THE PAINS AND PENALTIES OF PERJURY THIS 19 DAY OF OCTOBER, 2006.

(Robert Gogolen

Exhibit A to Gogolen Affidavit

#### **BERYLLIUM PRODUCT**

#### POTENTIALLY HAZARDOUS MATERIAL

Care should be taken to avoid inhaling dust or fumes. Secondary operations which can generate dust or fumes (such as abrading, chemical etching, lapping, grinding, scoring, or firing over 1000°C) must be performed in facilities which meet OSHA standards.

# BERYLLIA CERAMIC

DANGER — INHALATION OF DUST OR FUMES MAY CAUSE SERIOUS CHRONIC LUNG DISEASE

POTENTIAL CANCER HAZARD BASED PRINCIPALLY ON ANIMAL TESTS

This product contains beryllium and may contain nickel. Overexposure to beryllium by inhalation may cause berylliosis, a serious chronic lung disease. Hazard Communication Regulations of the Occupational Safety & Health Administration require that caution labels for materials listed as potential carcinogens in either the International Agency for Cancer Research Monograph Series or the National Toxicology Program Annual Report on Carcinogens must contain a cancer warning. Beryllium and nickel have been so listed.

- If processing produces dust or fumes, use only with exhaust ventilation or other controls designed to meet OSHA standards.
- · Sold for manufacturing purposes only.

See Material Safety Data Sheets on file with your employer for further details concerning OSHA standards and precautionary measures.

Assistance in establishing safe procedures may be obtained by contacting General Ceramics Inc., First Avenue, Haskell, N.J. 07420, Tel.: 201-839-1600.

Exhibit B to Gogolen Affidavit

#### 12137-JLT Document 111-14 Filed 10/30/2006. Page 9 of 41

#### SECTION I — IDENTIFICATION

National Beryllia Division GENERAL CERAMICS, INC.

First Avenue Haskell, NJ 07420

Product Name: K150 BERLOX

Common Name & Synonyms: Beryllia Chemical Name: BERYLLIUM OXIDE

Formula BeO

Telephone: CHEMTREC 800-424-9300 General Ceramics: 201-839-1600

Hazard Rating Least Slight 0 1 Moderate High 2 Extreme

Health 2

> Fire 0

Reactivity 0

#### SECTION II — HAZARDOUS INGREDIENTS

**INGREDIENT** 

**PERCENT** 

C.A.S. NO.

BERYLLIUM OXIDE

99.5

1304-56-9

#### SECTION III — OCCUPATIONAL STANDARDS (BERYLLIUM)

(All Concentrations Are As Micrograms per Cubic Meter Of Air)

**OSHA** 

**ACGIH** 

CEILING **PEAK** TLV TLV-STEL PEL Substance 5 2 N/A 2 25 **BERYLLIUM** 

ACGIH

= American Conference of Governmental Industrial Hygienists

PEL

= Eight Hour Average Permissible Exposure Limit

CEILING = Not To be Exceeded Except For Peak Limit

PEAK

= 30 Minute Maximum Duration Concentration Above Ceiling Limit

= Eight Hour Average Threshold Limit Value TLV TLV-STEL = 15 Minute Short Term Exposure Limit = ACGIH Ceiling Limit—Not To Be Exceeded (C)

= Not Applicable N/A

#### SECTION IV — GOVERNMENTAL REGULATIONS

#### EPA EMISSION STANDARD (As Beryllium) -

0.01 Micrograms per cubic meter (30 day average) Ambient

Air Standard

10 Grams/24 Hrs. Total Site Emission Limit

#### DOT SHIPPING REGULATIONS -

No special Requirements

#### **EPA WASTEWASTER REGULATIONS —**

None-Regulations are Pending

NOTE: State and Local Regulations may vary

#### SECTION V — HEALTH HAZARDS

Effects of Over-Exposure: Inhalation of Beryllium Oxide Powder may cause berylliosis, a serious chronic lung disease, with cough, chest pain, shortness of breath, weight loss, weakness, and fatigue. Beryllium-containing materials have been listed by the National Toxicology Program Annual Report on Carcinogens, and the International Agency for Research on Cancer Monograph as a potential carcinogen (cancer producing agent). Handling of solid shapes presents no dermatitis or skin absorption problem.

#### SECTION VI — EMPLOYEE PROTECTION

**Respiratory Protection:** NIOSH approved high efficiency cartridge or supplied air mask is required if Beryllium in air concentrations exceeds OSHA standards.

Eye Protection: None required except as related to normal operations.

Protective Gloves: None normally required.

Other Protective Equipment: Personnel performing operations where there are exposures to dust, mists, or fumes should be provided full-body protective clothing.

**Ventilation:** Provide adequate local exhaust ventilation when performing operations such as machining, grinding, laser trimming, sand blasting, chemical etching, etc. where respirable dusts, mists, or fumes are generated. Powdered materials must be stored in sealed containers; transfers must be made in ventilated hoods. Operations generating airborne material must be air sampled to determine exposure levels. Medical surveillance should be conducted for employees where warranted by exposure date. Concentrations of suspended Beryllia in liquid coolants used for machinery should be kept low to avoid particulate matter from becoming airborne.

#### SECTION VII — FIRST AID

**Skin Contact:** Properly clean any contaminated clothing. Wash body especially under folds of skin and fingernails. Cover any open wounds to avoid infections. Dermatitis from handling is usually limited to abrasion.

Eye Contact: Flush eye with Boric Acid Solution for approximately 20 minutes.

Inhalation: Remove from source of exposure, have sinus cavities flushed by qualified physician.

Ingestion: Fired, solid Beryllium Oxide Ceramics are indigestible.

SECTION VIII — FIRE AND EXPLOSION DATA				
Flash Point (method used): N/A				
Flammable Limits: LELN/A	UEL	N/A		
Extinguishing Media Water				
Special Fire Fighting Procedures None				
Unusual Fire and Explosion Hazards None				

# SECTION IX — SPECIAL PRECAUTIONS

**Precautions for Handling and Storing:** Store in closed containers. Handling solid Beryllium Oxide ceramics is harmless so long as they are kept dust-free. Avoid any operations which would create respirable dust or mists.

**Spill or Leak Precautions:** Clean any loose material using wet cleaning or properly equipped vacuum cleaner supplied with Hepa filters. Personnel involved in cleanup should wear proper respirator and protective clothing.

# SECTION X — WASTE DISPOSAL METHOD

Because of its value Beryllium Oxide scrap is normally recycled. In cases where economics do not justify the segregation of Beryllium Oxide scrap for resale, solid material may be landfilled. Because of the potential inhalation hazard of handling this material as a discarded powder (such as baghouse fines) we recommend it be: 1) Sealed in two plastic bags, 2) placed within a DOT container approved for Poison B compounds, 3) label the outer container with the appropriate DOT Hazard Warning Labels, and 4) Ship to an approved hazardous waste disposal site.

		SECTION XI — P	HYSICAL	DATA	
Boiling Point (°F)	N/A	Vapor Pressure (mm/Hg)	N/A	Spec Gravity (H <sub>2</sub> O = 1)	2.85
Vapor Density (Air = 1)	N/A	Evaporation Rate (Water = 1)	N/A	Solubility in Water	N/A
Percentile Volat	ile N/A	Appearance:	/hite Solid		
Molecular Weight:	25.01	Melting Point:	2547°C		

SECTION XII — REACTIVITY DATA					
Unstable	X Stable	Hazardous Polymerization	May Occur	Will Not Occur	
Conditions and Materials to Avoid: Volatile Beryllium Hydroxide can be formed when firing solid Beryllium Oxide parts at high temperatures (over 1200°C) and in moist atmospheres.  Hazardous Decomposition Products: None, except as noted above.					

	SECTION XIII — REFERENCES	
ACGIH:		

**Exhibit C to Gogolen Affidavit** 

Case 1:04-cv-12137-JLT Document 111-14 Filed 10/30/2006 Page 13 of 41

**Inspection / Test Procedure** 

# INSPECTION / TEST PROC.

NO. VOCE 6286

Window, Radio Frequency

INSPECTION/TEST AREA: Incoming Mech.

TEST STATION NO.

ISSUE NO.:

A-11215328-0-Rev. 3 4

ISSUE DATE:

October 18, 1966

HAZARDOUS MATERIAL CAUTION - SPECIAL HANDLING See Page #2

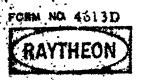
# SOURCE OF PERFORMANCE SPECIFIC FOR NBC \*CM-2705

MPB REVISION NO.

SCHEMATIC:

PRODUCT PRINT NO.: 0-11215328-Rev. # E

EO 71-43729



## INSPECTION / TEST PT.

HEMI: Window, Radio Frequency A-11215328

CHAR

CHARACTERISTIC/ DIMENSION/TEST

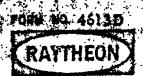
#### HAZARDOUS MATERIAL

Do not attempt to open packages or inspect parts until parts have been cleaned per MPB 11215328 "Special process to clean incoming material prior to inspection."

Inspection must be performed in the MSR Assembly area by a designee of, and monitored by the beryllium control coordinator. Finger cots or gloves must be used at all times when handling parts. Parts are extremly brittle and fragile and care should be taken in handling as not to chip, crack, or break parts.

Broken windows are to be reported to the control coordinator at once.

Reference General Procedure #37+3006-172
\*\*Beryllium Oxide, Handling Of. \*\*



# INSPECTION / TEST BROS

ITEM: Window, Radio Frequency

A-11215328

OHAR NO.	CHARACTERISTIC/ DIMENSION/TEST	
The Action of th	<ul> <li>(A) Part number identification</li> <li>(B) Damage</li> <li>(C) Additional requirements on purchase order such as CSL, DCN, Packaging Specs, etc.</li> <li>(D) Manufacturers name and/or symbol.</li> </ul>	
.tv	Assure that inspection equipment is within the Calibration M-day due.	
	Ceramic - Beryllia Molded	Ge

#### PROTECTIVE FINISH:

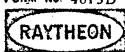
#### (A) Finish:

Metallize with Moly-Maganese & Nickel Plate

# (B) General Workmanship of Finish:

The nickel plating shall be smooth, fine grained, adherent, and free from visible blisters, pits, nodules porosity, indications of burning and excessive edge build-up. Slight discoloration resulting from baking shall not be cause for felection.

WITHOUT VISUIL



ITEM: Window, Radio Frequency

A-11215328

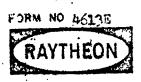
CHAR CHARACTERISTIC / DIMENSION / TEST  The Imperior shall examine each part   Dimension for the following:		A-11217320
DIMENSION/TEST  The inspector shall examine each pervious for the following:  A Words in metalized area  B Overnan or splatter of metalizering agent  C Tracks and chips  D Flating or pooling of metalizering agent  NOTE: Check visually for evidence of broken edg  if break appears excessive, use comparate  to check .0001  1.608 - 1.611 0.D.  NOTE: Check part at least three places around 0.D. to assure part is not out-of-round beyond  tolerance.  Part must be turned over and checked on both sides to assure dia. does not taper over or under dia. tolerance.  1.153 - 1.17  Thickness  NOTE: Check in numerous places to assure part does not taper out of tolerance.  2.26 - 1.30  Length of metalized.	HAR	CHARACTERISTIC/
The inspector shall examine each per 1997 Manufaction for the following:  And Woods in metalized area  B course or spletter of metalizeing agent  C tracks and chips  D Flating or pooling of metalizeing agent  E Foreign material  Break sharp edges .0001  NOTE: Check visually for evidence of broken edge if break appears excessive, use comparate to check .0001  1.608 - 1.611 O.D.  NOTE: Check part at least three places around O.D. to assure part is not out-of-round beyond tolerance.  Part must be turned over and checked on both sides to assure dia. does not taper over or under dia. tolerance.  1.53 - 1.57  Thickness  NOTE: Check in numbrous places to assure part does not taper out of tolerance.  2.6 - 2.7 .30  Length of metalized.		DIMENSION / TEST
Break sharp edges .0001  NOTE: Check visually for evidence of broken edges if break appears excessive, use comparate to check .0001  1.608 - 1.611 0.D.  NOTE: Check part at least three places around 0.D. to assure part is not out-of-round beyond tolerance.  Part must be turned over and checked on both sides to assure dia. does not taper over or under dia. tolerance.  1.53 - 1.57  Thickness  NOTE: Check in numerous places to assure part does not taper out of tolerance.  26 - 27 .30  Length of Metalized.		
B - Overrun or splatter of metalizeing agent  C - Cracks and ohips  D - Flating or pooling of metalizeing  E - Poreign material  Break sharp edges .0001  NOTE: Check visually for evidence of broken edg  if break appears excessive, use comparate to check .0001  1.608 - 1.611 0.D.  NOTE: Check part at least three places around 0.D. to assure part is not out-of-round beyond tolerance.  Part must be turned over and checked on both sides to assure dia. does not taper over or under dia. tolerance.  1.153 - 1.157 Thickness  NOTE: Check in numerous places to assure part does not taper out of tolerance.  2.26 - 1.30 Length of metalized.	4	The Inspector start examine during the following
Break sharp edges .0001  NOTE: Check visually for evidence of broken edges if break appears excessive, use comparate to check .0001  1.608 - 1.611 0.D.  NOTE: Check part at least three places around 0.D. to assure part is not out-of-round beyond tolerance.  Part must be turned over and checked on both sides to assure dia. does not taper over or under dia. tolerance.  1.53 - 1.57  Thickness  NOTE: Check in numbrous places to assure part does not taper out of tolerance.  2.6 - 1.30  Length of metalized		
Break sharp edges .0001  NOTE: Check visually for evidence of broken edges if break appears excessive, use comparate to check .0001  1.608 - 1.611 O.D.  NOTE: Check part at least three places around O.D. to assure part is not out-of-round beyond tolerance.  Part must be turned over and checked on both sides to assure dia. does not taper over or under dia. tolerance.  1.53 - 1.57  Thickness  NOTE: Check in numerous places to assure part does not taper out of tolerance.  2.6 - 1.30  Length of metalized		B - Overvun or oplatter of metalizeing agent
Break sharp edges .0001  NOTE: Check visually for evidence of broken edge if break appears excessive, use comparated to check .0001  1.608 - 1.611 0.D.  NOTE: Check part at least three places around 0.D. to assure part is not out-of-round beyond tolerance.  Part must be turned over and checked on both sides to assure dia. does not taper over or under dia. tolerance.  1.153 - x.157  Thickness  NOTE: Check in numerous places to assure part does not taper out of tolerance.  26 - 27 .30  Length of metalized.		C Cracks and only
Break sharp edges .0001  NOTE: Check visually for evidence of broken edge if break appears excessive, use comparator to check .0001  1.608 - 1.611 0.D.  NOTE: Check part at least three places around 0.D. to assure part is not out-of-round beyond tolerance.  Part must be turned over and checked on both sides to assure dia. does not taper over or under dia. tolerance.  1.53 - 1.57  Thickness  NOTE: Check in numerous places to assure part does not taper out of tolerance.  26 - 27 .30  Length of metalized.		De Fluking or pooling of motalizoing
NOTE: Check visually for evidence of broken edg if break appears excessive, use comparato to check .0001  1.608 - 1.611 O.D.  NOTE: Check part at least three places around O.D. to assure part is not out-of-round beyond tolerance.  Part must be turned over and checked on both sides to assure dia. does not taper over or under dia. tolerance.  153 - 157  Thickness  NOTE: Check in numerous places to assure part does not taper out of tolerance.  26 - 27 .30  Length of metalized.		- Foreign natorial
NOTE: Check part at least three places around O.D. to assure part is not out-of-round beyond tolerance.  Part must be turned over and checked on both sides to assure dia. does not taper over or under dia. tolerance.  153 - 157 Thickness  NOTE: Check in numerous places to assure part does not taper out of tolerance.  26 - 27 30 Length of metalized.	34	NOTE: Check visually for evidence of broken edge if break appears excessive, use comparator
sides to assure dia. does not taper over or under dia. tolerance.  153 - 157 Thickness  NOTE: Check in numerous places to assure part does not taper out of tolerance.  26 - 17 .30 Length of metalized.	<b>5</b>	NOTE: Check part at least three places around O.D. to assure part is not out-of-round beyond tolerance.
NOTE: Check in numerous places to assure part does not taper out of tolerance.  26 - 27 .30 Length of metalized.  Width of Metalized.		sides to assure dia. does not taper over or
does not taper out of tolerance.  26 - 57 .30 Length of metalized.  Width of Metalized.	S.	.153 -x.157 Thickness
Width of Metalized.	6	NOTE: Check in numerous places to assure part does not taper out of tolerance.
		.26 - 472 .30 Length of metalizat
I INCLASSIFIE		

BAYTHEON

### INSPECTION / TEST F.

ITEM: Window, Radio Frequency A-11215328

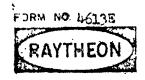
<b>₫</b>	A-11217320
CHAR NO.	CHARACTERISTIC/ DIMENSION/TEST
哲9	.0002  Allowable cut-back of metalizeing on O.D. (2 Places)
亚	The .2627 Dim., at Max. material condition, to be symmetrical to DiaA- (1.608 - 1.611 dia. régardless of feature size (within .01)
10	NOTE: The .Ol symmetry tolerance may be exceeded by the amount the .26 3000 dimension is under the .20 maximum.
11	The .0305 dimension, regardless of feature size, to be symmetrical to diaA- (1.608 - 1.611 dia.) Regardless of datum size, within .01
	-Complete I R. Porm No. 4665
12	VOIDS, FLAKING, OR
- 4 - 9	PeeLing of METALIZEM
	NOTE: THE INSPECTOR
	SHALL EXAMINE THE
391.1	METALIZED AREA
	VISUALLY FOR
	NOIDS. IF A VOI
7	APPEARS GREATER
	THAN 1/64" IT
	SHOULD BE MEASUR.
	WITH A SCALE. NO
·	SHALL BE GREATER TH
	SEE FIG # / UNCLASSIFIED



# INSPECTION / TEST

ITEM:

AR	CHARACTERISTIC/ DIMENSION/TEST
0.	
3	CRACKS & CHIPS
	THE INSPECTOR SHAL
	EXAMINE THE PARTS
	VISUALLY FORE CHARE.
	AND CHIPS - IF THE
	CHIPS APPEAR VISUAL.
	TO EXCEED AN AMER
	OF .OBS SQUARLE
	OR .015 DEEP IT
	SHOUID BE MEASURES
•	SHOULD BE MEASURES USING THE 063
	COURTE TENDENTE 01
	SQUARE TEMPLATE OF
•	6" SCALE, MORE THE
	FIVE CHIPS A.ROUNI
	THE DIA. WHICH AR.
, .	VISUAL WITHOUT THE
	AID OF MARCHIFICAL
	ARE NOT ACCEPTAGE
	REGARDLESS OF S.
1	SEE FIGHT
	·



# INSPECTION / TEST

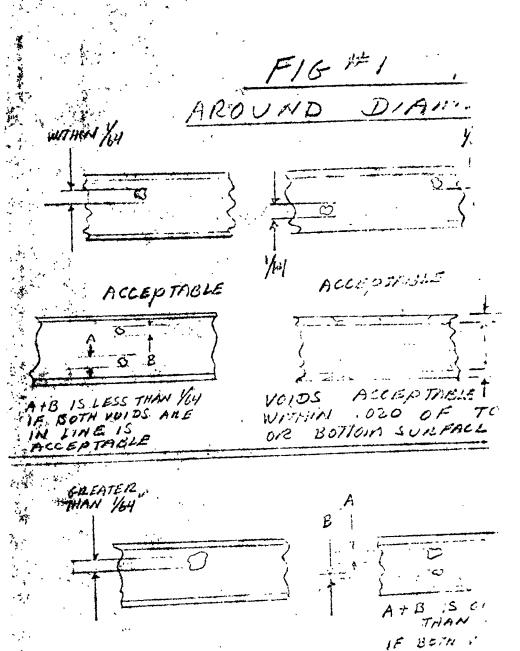
ITEM:

CHAR NO	CHARACTERISTIC/ DIMENSION / TEST
14	FOREIGN MATTER
	TO CONSTITUTE AN
	UNI ACCEPTABLE CONDITION
	FOREIGN MATTER EITHER
	IMBEDED OR ON THE
	MUST BE VISUAL WITHOUT
	1
	THE AID OF MAGNIFICATION
	REMOVEABLE WITH
	A SOFT RUBUSER
15	OVER RUN MD/OR SPLANCE.
	I CONCHIUL FIN
	TACKE CONTRACTOR
	ALGRINA MILTERIAL
	RUNNING OVER ON FREE OF AND: SPLATTER OF METRIC
<i>i.</i>	MUST BE VISUAL WITH
ľ	THE AID OF MAGNIFICA.
	Complete 1712
	FURM # 4665

UNCLASSIFIED

ALE IN W

UN ACCE.



UNACCEPTABLE

UNACCEPTABLE

Case 1:04-cv-12137-JLT Document 111-14 Filed 10/30/2006 Page 23 of 41

**Material Purchasing Specification, Metalized Beryllium Oxide Ceramics** 

#### MATERIAL PURCHASING SPECIFICATION

#### METALIZED BERYLLIUM OXIDE CERAMICS

#### 1.0 GENERAL

#### 1.1 Purpose

1.1.1 To cover the specifications of ceramics and metalized ceramics used in high power long life vacuum tube manufacture.

#### 1.2 Scope

- 1.2.1 This specification covers the requirements for dense, non-porous, beryllium oxide ceramic parts and metal coatings on ceramic parts used in high power long life vacuum tubes.
- 1.2.2 In any and all respects not covered by this specification, the material shall be in accordance with the standard practice of the supplier.

#### 2.0 APPROVAL

- 2.1 Usage The behavior of the material is to be similar to that of lots previously received and approved by Raytheon Company.
- Lot Identification Raytheon Quality Assurance and the vendor will establish, through mutual agreement, the definition of a lot for the purposes of Acceptance inspection and/or test. The vendor will submit, by letter, his method of lot control and lot identification. This control and identification shall be such that the lot is traceable to the major variables in his processing. Units of product within one lot shall be homogeneous for these variables. Raytheon Quality Assurance will review the vendor's method and, upon reaching an agreement, will indicate approval by letter. The approved lot definition and lot identification will become a part of this specification. Record of the letters will be indicated on the purchase order.

In the absence of prior mutual agreement between Raytheon Quality Assurance and the vendor, each shipment will be considered a lot subject to acceptance or rejection.

- 2.3 Packaging and Shipment of Farts by Vencor
  - 2.3.1 Parts shall be cleaned by Vendor prior to shipment (preferably by Ultrasonics.)
  - 2.3.2 Packing material shall be free from dusts of beryllium and its compounds.

			• •	,					4 ≅ I
		·		CBB	888	C.	CREV. LTR	REV. STATUS.	Ž
	. •	•		7135	4 3 2	11	SHEET NO	OF SHEETS	×
HAME DATE	· 1 .			. :		-	RAYTHEON	LEXINGTO MASS. 02173	H.
Literating 6-22.	. 171	TALIZED	BERYLLIUM	OXIDE CE	RAMICS		· · <del>·</del> · · ·	55039	
L. Tura kang 11-27-		CM.	-1219	f 4CA	231	) 6		S SH 1 of	7:

TWT

- Parts shall be sealed in clear polyethylene plastic bags.
- Outside of package shall be marked with Purchase Order No., Part 2.3.4 Nc., and Quantities.
- 2.3.5 Three copies of an inspection certificate of compliance to Sections 3.0 and 4.0 shall be submitted with each shipment. These, along with the packing slips to be contained in the shipping unit.
- 2.3.6 The following shall be placed on the outside of each package:
  - "Contains Beryllium Oxide."

  - "Do not open package."
    "On receipt, deliver to Thoria Mixing Room."

Į

B- CORR. - HIPHISO AMERICA

EVISIONS, A FENT MITE

- The following chemical, electrical and physical properties are for reference only.
  - 3.1 Chemical Composition
    - 3.1.1 The beryllium oxide content is to be 99.5% minimum.
  - 3.2 Electrical Properties
    - 3.2.1 Dielectric Constant (K)

316°C 600°F 6.5	Room Temp.	10,000 mc	
		10,000 mc	

3.2.2 Loss Tangent (tan 8)

		316°C	6h9°C	871°C
	Room Temp.	600°F	1200°F	1600°F
10,000 mc	0.0010	0.0011	0.0015	0.0016

The Dielectric Constant and Loss Tangent results are NOTE: based upon measurements obtained using a shorted waveguide technique.

> The maximum variation is not to exceed + 5% of values for dielectric constant and loss tangent.

3.2.3 Dielectric Strength (volts/mil)

Room Temperature

The Bielectric strength is measured using a 0.030 inch thick specimen (A.S.T.K. test D 667-LhT)

Electrical Resistivity (ohm-cm)

•		36
Room Temperatu	re	2 x 10 <sup>16</sup>
.200°C	(392°F)	2 x 10 <sup>11</sup>

500

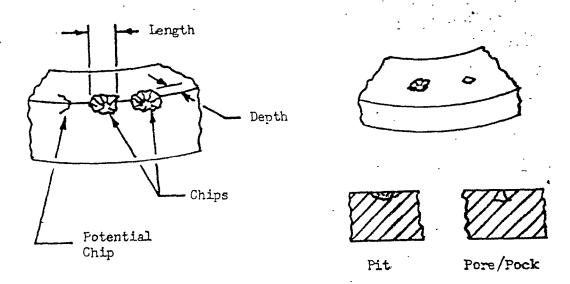
1	NAME DATE  1. Tyrnten 6 22.67 METALIZED BERYLLIUM OXIDE CERAMICS	RAYTHEON	LEXINGTON MASS. 02173
-	1	- 65503	39
+		CODE 49956 S	н 2
1	APPROVED		

C	ase 1:04-cv-12137-JLT Document 111 <del>v</del> 14 Filed	10/30/2006 Page 26 of 41
	<b>t</b> '-	
L.0	PHYSICAL PROPERTIES	
	4.1 Density (g/cc)	2.86-2.95
	4.2 Water Absorption	0.0 Off White
	h.h Modulus of Rupture (p.s.i.)	25,000
	4.5 Tensile Strength (p.s.i.) 4.6 Compressive Strength (p.s.i.)	13,000 150,000
	1.7 Yelting Point (4620°F) (2549°C)	3400°F) (1871°C)
,	1. O Smootfie Heat (Btn/1h.)	0.30
T	4.9 Specific hear (Bow 18.7) 4.10 Thermal Conductivity (Btu/hr/ft <sup>2</sup> /or/ft	
	Room Temperature	11,0
	600°F (316°C) 1500°F (816°C)	60
	•	
	h.ll Thermal Expansion (in/in/oF	4
	Room Temperature to $500^{\circ}$ F (260°C)	4.1 x 10 <sup>-6</sup>
5.0	VISUAL REQUIREMENTS	· · · · · ·
	Parts to be examined under LOX magnification i	for surface imperfections.
	5.1 Definition - Surface Imperfections	
	5.1.1 Pit - A microscopic or macroscopic any surface (exclusive of edges) to	that does not retain dye
	twent	<u>`</u>
	5.1.2 Pore/Pock - A microscopic orifice has the ability to retain a dye pe	enetrant. The deput of the
	"pore" can be finite (forming a confirm one surface to another).	avity) or infinite (continuous
	g 1 2 Omen Chins - An open cavity locat	ed along the edges. This
	designation is strictly confined  5.1.4 Closed Chips - A partially closed	cavity located along the edges.
	This designation is confined to c	orner-like edges.
	r a 4 Cours on Sanatch - A shallow error	A6-TIKE OTEMIZED (WECLO- OL
	microscopic) that does not retain tion does not apply to corner-lik	e edges.
4	5.1.7 Rlemishes-Spots - Any imperiectlo	on, discoloration of spots
IN U.S.A	The second of th	ramic diffiace exclusive of earest
PRINTED 1	5.1.9 Potential Chips - (Closed Chip) - completely.	
K K	5.1.10 Flaws - Designated to include all specified) such as pits, pores, p	imperfections (unless otherwise books, dents, etc. in meritical
ž	area."	
VELLUM		•
VELL 2810		LEXINGTO
NAME	DATE  6:22:17	RAYTHEON MASS. 02173
1	METALIZED BERYLLIUM OXIDE	655039
7 Y		CODE 49956 SH 3
	PROYED	4 4,,001-11

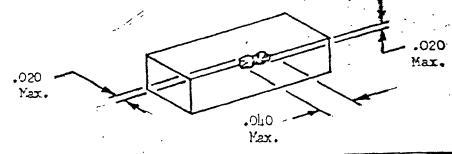
5.1.11.1 Burr - A protruding foreign particle fused onto the ceramic surface.

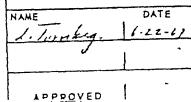
5.1.11.2 Fins or Flashings - Excess materials adhering onto the sides, ends, or edges of ceramic.

5.1.12 Bleb - A small blister or mound-shaped projection on the ceramic surface or metal coated surfaces caused by the inclusion of air or other gases or foreign matter.



- Non-Critical Area Requirements (Applies to those surfaces which are not 5.2 Metalized)-
  - 5.2.1 Chips (Open and Closed)
    - Chips of depth less than .015 shall not be considered 5.2.1.1 cause for rejection.
    - Chip dimensions shall not exceed those shown in figure. 5.2.1.2 The total number of chips shall be limited to 1 per edge





METALIZED BERYLLIUM OXIDE CERAMICS

RAYTHEON

LEXINGTON MASS. 02173

ξ

7-25-67

LADAISO HADEA

0000

11.7

655039

49956 SH

ξ

TVT

10.0706 V ó

Ź

1-7-25-67

GULLED

COCR. - MPR150

REVISIONS LA

LEXINGTON

MASS. 02173

5.2.2 Potential Chips (Closed) - There shall be none. 5.2.3 Dents -5.2.3.1 Dents less than .015 maximum in depth shall not be considered cause for rejection. 5.2.3.2 Depth of other dents shall be limited to .020. 5.2.4 Pits -5.2.4.1 Pits less than .015 maximum at the opening shall not be considered cause for rejection. Depth of pits shall be limited to .020 maximum. 5.2.4.2 5.2.4.3 Pock/Pore - The area of dye penetrant surrounding a pock or pore shall not exceed .020 maximum in diameter 5.2.5 Gouges and Scratches -5.2.5.1 Gouges and Scratches less than .002 maximum in depth shall not be considered cause for rejection. Depth of other gouges and scratches shall be limited to .015 maximum. The number of gouges and scratches shall: not exceed 2. Cracks .- There shall be no cracks or fissures. Blebs/Blisters - There shall be none. 5.2.7 Adhered Foreign Material - There shall be none. 5.2.8 5.2.9 Blemishes and Spots - There shall be none. 5.1.7: Recent parts are of acceptable standard. \* unt quite subjective "Critical Area Requirements" (Applies to surfaces to be metalized as designated on the individual part drawing). 5.3.1 Flaws -There shall be no flaws in the critical area "C" in 5.3.1.1 excess of W = .020 max. x = .020 wide. The number of flaws shall not exceed 2. 5.3.1.2 The depth of any flaw in a critical area 5.3.1.3 shall not be greater than .010. There shall be no more than one flaw . 5.3.1.4 across the critical area "C". Any two adjacent flaws must be separated by .200. Potential Closed Chips - There shall 5.3.1.5 be none. Cracks - There shall be none. 5.3.1.6 Blemishes and Spots - There shall be none. 5.3.1.7 Adhered Material - There shall be none. 5.3.1.8 Blebs/Blisters - There shall be none. 5.3.1.9 (Applies to coating as well).

TNT

Ξ

VELLUM

ĕ

NAME DATE

L. Turnteg 6.22-47

METALIZED BERYLLIUM OXIDE CERAMICS

655039

CODE 49956 S

#### 6.1 Types of Coatings

6.1.1 Each type of coating shall conform to the applicable part

#### 6.2 Areas to be Coated

6.2.1 The coated areas shall conform to the specified limits on applicable part drawing.

#### 5.3 Thickness of Coating

- 5.3.1 The thickness of each coating shall be as specified on the applicable part drawing.
- Tisual Requirements Coatings to be examined under a 1CX magnification imperfections.
  - \* 5.1.1 Chipped Coatings There shall be none. 6.4.2 Pitted Coating - The depth of pitted area shall be limited to the thickness of the specified metalizing and must be in an area other than at corner or edge.
    - 6.4.2.1 There shall be no depression in the coated critical area "C" in excess of W = .020 and I = .020.
    - 6.4.2.2 The number of depressions in any critical area shall be limited to 1.
    - 6.4.2.3 Any depressions spaced closer in any location than the depression maximum dimension will be measured across the most extreme ends.
    - 6.4.2.4 Single small depressions will not be considered if their dimensions do not exceed the following maximum limits: X = .010 W = .010.
  - 5.1.3 Lumpy Coating There shall be none.
  - 4.4.4 Blebs/Blisters There shall be none. 5.4.5 Poor Adhesion - There shall be no peeled plating as evidenced by
  - detachment of the plating from the base metal. 5.4.6 Pare Spots - There shall be no bare spots in the plating.
  - \* 5.1.7 Stains, Foreign Material and Uniformity
    - .6.4.7.1 Stains .- There shall be no discoloration of the plated metal surface which may be in the form of either bleeding out, finger prints, grease, or gas streaks.
    - 6.4.7.2 Foreign Material .- There shall be no foreign material such as plating salts, lint or masking material.
    - 6.4.7.3 Plating shall be of a uniform color characteristic of the metal used.

HAME APPROVED

METALIZED BERYLLIUM OXIDE CERAMICS

LEXIMOTON RAYTHEON MASS. 02173 655039 49955

 $\tilde{3}$ 

77

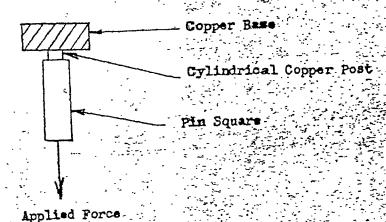
S) H

REVISIONS! A

PRINTED IN

10- RELEVA 10-7 LARID VELEVA 10-0766 FILM FORK NO.

- 6.4.8.1 A sample of 0.1% of the quantity of each lot or a minimum of 10 pieces of incoming parts is to be subjected to a tensile pull test. The pull test specimen must be made in accordance with the following details:
  - 6.4.8.1.1 A cylindrical copper post having a diameter of approximately 0.5 the width of the Pin-Square and a length of .. 015% MIN. is to be silver plated, .0002 to .000h inches thick.
  - The post is to be brased to the center of one 6.4.8.1.2 end of the Pin Square in a hydrogen atmosphere at 825°C. The resultant brazed assembly must have no voids in the solder joint between the post and pin, examined under 10% magnification
  - The assembly is to be rebrazed in a hydrogen. 6.4.8.1.3 atmosphere at 825°C to a ridged copper base having a silver plated (.0002 to .0004 thick) brazing surface suitable for holding in a tensile pulling device. The resultant braxed assembly must have no voids in the solder. joints between the pin and post, or post and base, examined under 10% magnification.
  - The ceramic to metal joint (plating to metal-6.4.8.1.4 izing band, metalizing to ceramic band) must be capable of withstanding a tensile pull test of a minimum of 17,700 PSI.



EVISIONS

No changes in the processes, materials and techniques used in the manufacture of the part shall be allowed unless approved by MPT Engineering.

LEXINGTON DATE RAYTHEON 02173 METALIZED BERYLLIUM OXIDE CERANICS; 655039 ---CODE 49956 SH APPROVED

ž.

Case 1:04-cv-12137-JLT Document 111-14 Filed 10/30/2006 Page 31 of 41

**Handling Specification** 

#### HANDLING SPECIFICATION

- SCOPE: This specification defines requirements for beryllium oxide 1.0 (beryllia) rods. This material shall be identified by Raytheon as 8713D.
- COMPOSITION: Proprietary (99.5% Min. Beryllium oxide). 1.1
- MATERIAL IDENTIFICATION: 1.2

Each variation or combination of variations to which this material shall conform will be identified by a suffix assignment as listed below. The column headed "Description" lists only the special requirements, i.e. tolerances, properties, etc., that pertain to a specific material and values or limits for such are presented in Section 2.2 under the appropriate headings with specific suffix listings. If no special requirements apply, the word "Standard" is entered in the "Description" column and requirements are presented in Section 2.1. When not specifically mentioned, standard criteria apply for such categories.

SIFFIX

DESCRIPTION

B713D1

Standard

- REQUIREMENTS: 2.0
- STANDARD REQUIREMENTS 2.1
- TOLERANCES: Appropriate part drawing must accompany this specification. 2.1.1
- The values shown below shall be average values for test 2.1.2 pieces.
- 2.1.2.1.6 PURITY: 99.5% or greater beryllium oxide
- PHYSICAL PROPERTIES 2.1.2.3
- 2.1.3.2.1 DENSITY: A typical value is 2.858  $g/\infty$ .
- 2.1.2.3.3 Coefficient of Thermal Expansion- Typical value 3.2 x 10-6 in/in/of, 25° to 200°C.
- 2.1.2.3.4 THERMAL CONDUCTIVITY:

Typical value

BIU- in/ft2/hr./F

16 ATK

**Q** 

4 O

N

20<sup>2</sup>C 100°C

400°C

1741.8 1306.3 580.6

- 2.1.2.3.5 WATER ABSORPTION: Impervious (0 .02%)
- FIFCIRICAL PROPERTIES 2.1.2.4

REVISIONS REV. LTR. REV. STATUS SHEET NO. OF SHEETS LEXINGTON MASS. 82173 NAME RAYTHEON BERYLLIUM OXIDE ROD 33-B-713D CODE 49956 SH / 0F 2 APPROVED

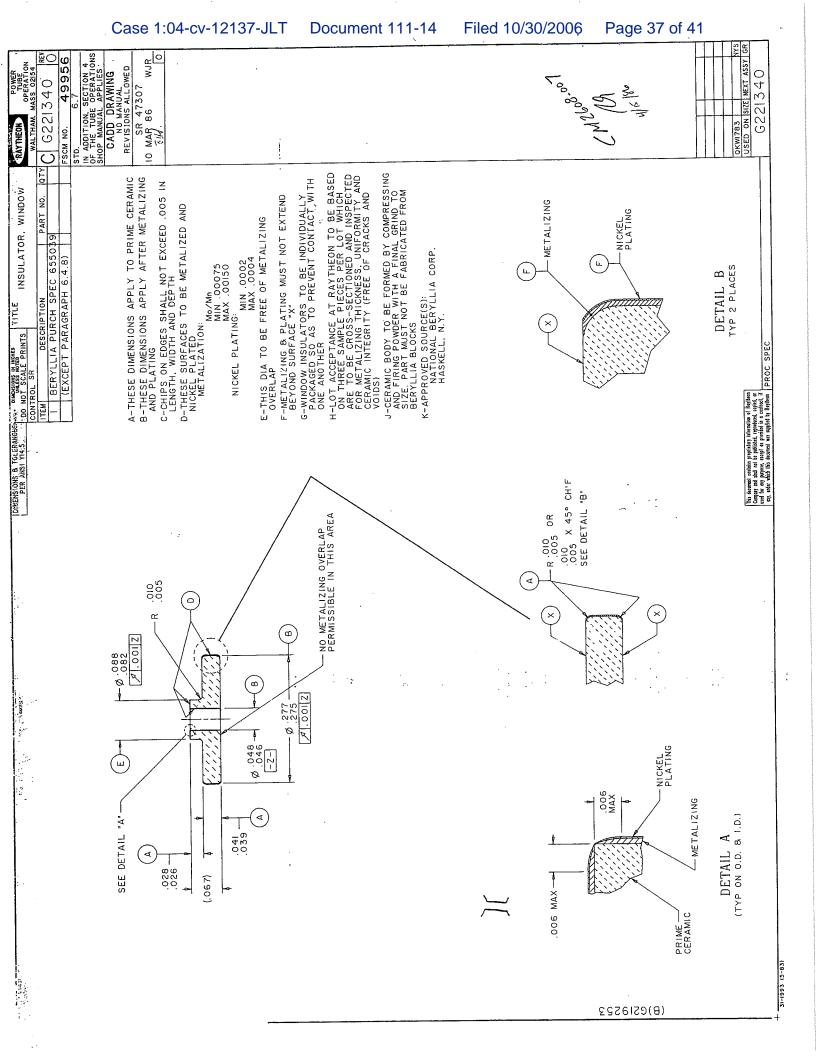
**Packing Information for Vendors** 

SMEET 1 OF 1

ATTENTION: INCOMING STORES - The Beryllium Control supervisor must be contacted immediately upon delivery of this item. Do not open. Each item shall be heat sealed in a suitable size polyethylene bag. Each bag shall be marked so as to identify the item by name. The heat seal shall be air tight. AEO 65580 PART NO. PIV-1073 DO NOT OPEN POLYETHYLENE BAGS UNLESS BERYLLIUM CONTROL SUPERVISOR IS PRESENT AND SAFETY MEASURES APPLICABLE TO THIS ITEM HAVE BEEN TAKEN. A quantity of items shall be placed in a suitable shipping cortainer in such a manner as to insure that the items can not touch each other. Sufficient dunnage should be used to prevent item shiftage. Shipping container must insure physical protection of its contents as Well as personnel handling container and the environment. The shipping container shall insure carrier acceptance and safe delivery. OATE ----BERYLLIUM WINDOW Shipping Container (MATIONAL BERYLLIA CORES Unit Container 161 5 19. CAUTION: HOMENCL ATURE INSTRUCTIONS II.

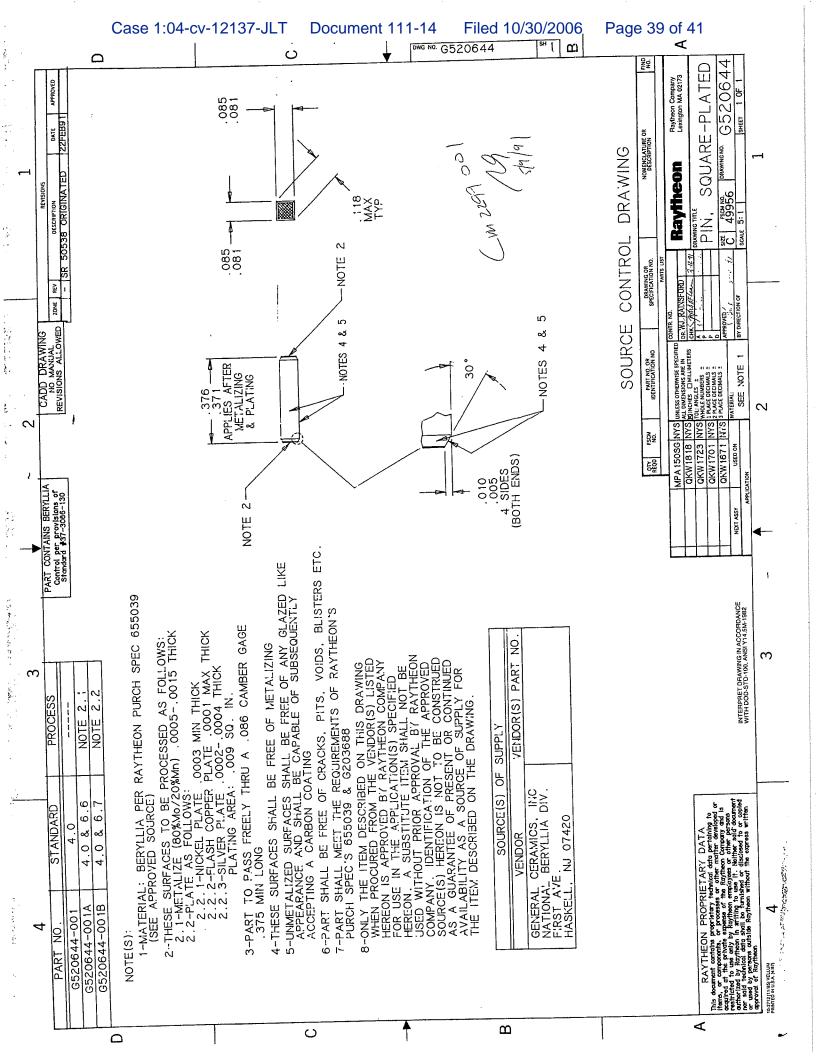
Case 1:04-cv-12137-JLT Document 111-14 Filed 10/30/2006 Page 36 of 41

Raytheon Plan and Specification for Insulator, Window



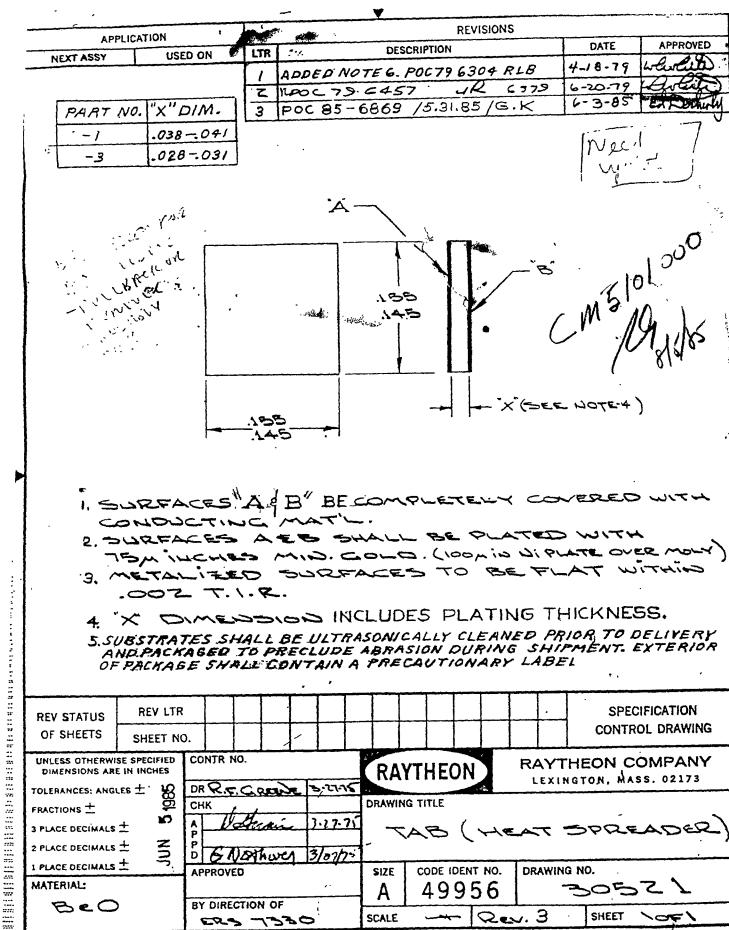
Case 1:04-cv-12137-JLT Document 111-14 Filed 10/30/2006 Page 38 of 41

Raytheon Plan and Specification for Pin, Square – Plated



Case 1:04-cv-12137-JLT Document 111-14 Filed 10/30/2006 Page 40 of 41

Raytheon Plan and Specification for Tab (Heat Spreader)



REV STATUS OF SHEETS	REV LTR		,								·		CIFICATION OL DRAWING	
UNLESS OTHERWI DIMENSIONS AR TOLERANCES: ANG	E IN INCHES	CONTR N		<u>_</u> -	5,27,		AYT	HEO	V				OMPANY ss. 02173	
FRACTIONS ±	DO ANNIAIC TITLE										ADER)			
1 PLACE DECIMALS MATERIAL:	<u> </u>	APPROVED				sız A	- } -	CODE IDENT NO. 49956			DRAWING NO.			
Bec	)		CTION OF	70		SCAI	E		2.	٠.٠	3	SHEET	YOF!	